

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

HARAS SANTA ISABEL, INC.

Debtor

CASE NO. 10-06672(MFC)

CHAPTER 11

OBJECTION TO CRIM'S PROOF OF CLAIM NUMBER 9

TO THE HONORABLE COURT:

COMES NOW Debtor through its undersigned counsel and very respectfully states and requests:

1. On July 27, 2010, Debtor filed a voluntary petition for relief pursuant to 11 U.S.C. Chapter 12, which was converted to a Chapter 11 case on September 27, 2010.

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. 157 (b) (2).

3. The statutory predicates for the relief sought herein are Sections 102, 105 and 502 of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy procedure.

4. This Court set November 23, 2010, as the deadline for filing proof of claims for creditors other than governmental entities, the bar date for which was fixed as January 23, 2011.

5. Prior to the commencement of the case Debtor maintained, in the ordinary course of business, books and records that reflected, among other things, liabilities and the amounts thereof owed to its creditors. Debtor has conducted a

review of the Proof of Claims and of its books and records, and has determined that certain of the claims asserted against Debtor are objectionable. Therefore, Debtor objects to the allowance of the claim listed below as follows:

POC #	Claimant	Total Amount Claimed	Classification of claim by Claimant	Amount Expected to be Allowed	Reason for Objection
9	CRIM	\$6,084.73	Priority	\$0.00	Debtor has been certified by the Puerto Rico Department of Agriculture as a bona-fide farmer, and pursuant to the Puerto Rico Agriculture Tax Incentives Act, Debtor's operations qualify for a 90% income tax exemption and 100% exemption from Property and Municipal Taxes. Therefore, Debtor does not owe any property taxes and this Proof of Claim must be disallowed.

NOTICE

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this objection has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an answer or other appropriate response to this objection with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no answer or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

WHEREFORE, it is respectfully prayed that the above objection be granted.

CERTIFICATE OF SERVICE: I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF

system, which will send notification of such filing to the Assistant US Trustee and to all CM/ECF participants, and by regular mail to **CRIM**, PO Box 195387, San Juan, PR 00919-5387.

San Juan, Puerto Rico, this 20th day of April, 2011.

s/CHARLES A. CUPRILL-HERNANDEZ
USDC-PR 114312

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